

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

UNITED STATES OF AMERICA

v.

**JAMES LAEL JENSEN
MAXWELL STERLING JENSEN
a/k/a “Max”
KELLY ANNE JENSEN
ZACHARY GOLDEN JENSEN**

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Case No. 1:25:cr-257

DEFENDANT MAXWELL STERLING JENSEN’S MOTION TO LIST EXHIBITS

TO THE HONORABLE COURT:

Now comes Maxwell Sterling Jensen, through his counsel, Robert L. Guerra, Jr., and files this his Motion to List Exhibits and in support thereof would show the following:

1. The list of exhibits that the United States Attorney will use in its case in chief is in the exclusive possession of said prosecuting attorney. The Defendant is entitled to the disclosure of such exhibits by the Government prior to trial, because without which she will be unable to adequately and fully prepare her defense, and thus will be denied a fair trial and effective assistance of counsel, guaranteed her under the Laws and Constitution of the United States.

Certificate of Conference

Pursuant to S.D. Tex. Cr. LR 12.2, counsel for Maxwell sterling Jensen attempted to confer with Assistant United States Attorney Laura Garcia, as to her position in this Motion and as of the time of this filing was unable to confer.

Prayer

Defendant, therefore, respectfully requests that the Court grant this Motion. If the Court deems it necessary, Defendant requests the Court set a hearing to consider further evidence and arguments in this matter.

Respectfully submitted,

LAW OFFICE OF ROBERT GUERRA, PLLC

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MAXWELL STERLING JENSEN

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served via e-mail on this 15th day of May 2025 to the following:

Ms. Laura Garcia Assistant United States Attorney United States Attorney's Office 600 E. Harrison, Rm 201 Brownsville, Texas 78520 Ph: (956) 548-2554 Email: laura.garcia@usdoj.gov	<input type="checkbox"/>	Regular Mail
	<input type="checkbox"/>	Certified Mail, RRR
	<input type="checkbox"/>	Hand Delivery
	<input type="checkbox"/>	Facsimile
	<input checked="" type="checkbox"/>	Electronic Mail

/s/ Robert L. Guerra, Jr.
ROBERT L. GUERRA, JR.